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7 Attorney for Christopher Balodimas

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CHRISTOPHER BALODIMAS,

15 Defendant.
16

Case No. 2:18-cr-257-JCM-GWF

STIPULATION TO CONTINUE
SENTENCING HEARING
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Linda Mott, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel
20 Lazo, Assistant Federal Public Defender, counsel for Christopher Balodimas, that the
21 Sentencing Hearing currently scheduled on March 21, 2019 at 10:00 a.m., be vacated and
22 continued to a date and time convenient to the Court, but no earlier than twenty-one (21) days.

23 This Stipulation is entered into for the following reasons:

24 1. Mr. Balodimas' presentence investigation report (PSR) was disclosed to the
25 parties on February 14, 2019. Informal objections are due to probation on February 28,
26 2019. Defense counsel needs time to review the PSR with Mr. Balodimas. She will not be able

1 to go to the jail in order to do so until February 26, 2019. Defense counsel is also trying to
2 coordinate a phone interview between probation and Mr. Balodimas' mother in order for her to
3 verify the information provided in the PSR.

4 2. Defense counsel also anticipates that she may need to file formal objections. If
5 so, additional time will be needed to conduct legal research and draft the objections.

6 3. The defendant is in custody and does not oppose a continuance.

7 4. The parties agree to the continuance.

8 This is the second request for a continuance of the sentencing hearing.

9 DATED this 15th day of February, 2019.

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11 RENE L. VALLADARES
12 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

13 */s/ Raquel Lazo*
14 By _____
15 RAQUEL LAZO
Assistant Federal Public Defender

/s/ Linda Mott
By _____
LINDA MOTT
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No. 2:18-cr-257-JCM-GWF

4 Plaintiff,

ORDER

5 v.

6 CHRISTOPHER BALODIMAS,

7 Defendant.

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9
10 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for
11 Thursday, March 21, 2019 at 10:00 a.m., be vacated and continued to April 16, 2019
12 at the hour of 10:00 a.m.; or to a time and date convenient to the court.

13 DATED February 20, 2019.

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15 
16 UNITED STATES DISTRICT JUDGE